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Date: Wed, 1 Jul 1998 17:54:16 -0700
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From: bnelson@savesfbay.org (savebay)
Subject: Section Omitted from DEIS Comments

Dear Lester:

I just learned that the following section was inadvertently omitted during the production of our comments on the draft EIS/R. Can you ask your staff to insert this section in our comments. I will mail a hard copy.

Thank you.

Barry Nelson

LONG TERM MANAGEMENT STRATEGY LINKAGES

* The DEIS/R Fails to Evaluate the Possible Linkages Between the CALFED Program and the Long Term Management Strategy Regarding Dredging in San Francisco Bay.

The Sonoma Bayland program has demonstrated potential ecosystem benefits from beneficial reuse of clean dredged materials. Such beneficial reuse opportunities are currently being investigated regarding Hamilton Field. However, neither CALFED nor the LTMS have adequately evaluated the potential use of clean dredged materials in the Delta for habitat restoration or levee maintenance.

The Levee Protection Plan document states that it "assumes that local borrow is readily available on the islands and that beneficial reuse of dredged materials will be maximized" (p. G-2). The document, however, does not evaluate obstacles to using clean dredged materials from the Bay, the costs of such materials, or the potential for funding partnerships with the dredging community. The salinity of dredged materials from the Bay has been cited as a major obstacle to its use in the Delta. We

believe that there are a variety of strategies which could be available to manage salinity issues. The document also fails to present or analyze these strategies.

The document does not adequately evaluate the potential benefits of dredged material reuse in the Delta for habitat restoration. The document states that dredged material could be used to reverse subsidence and restore tidal wetlands and other habitats (ERPP, Vol. 1, p. 14, 81 and 286; V. II, p. 59). However the document then dismisses this potential with the statement that "Restoration efforts should focus on those leveed lands that have not yet been subjected to severe subsidence" (ERPP, Vol. 1, p. 81).

The document does not evaluate the relative potential value of habitat restoration in areas where subsidence is a key obstacle (e.g. the central and western Delta) in comparison with habitat restoration in currently unsubsidized areas. The ERPP could, therefore, be missing a valuable tool to restore habitat in the Western Delta to provide key fisheries habitat in dry years, downstream from the major influence of Delta diversions.

Finally, the document indicates that the Department of Water Resources is one of the most significant landowners in the Western Delta (ERPP, Vol. II, p. 24). Given that Delta landowners have called for restoration to be focused on publicly owned lands, dredged material reuse could be an important tool to increase support for the ERPP.

We recommend that the DEIS/R be revised to evaluate the potential reuse of clean dredged materials from the Bay for habitat restoration and levee maintenance. The document should evaluate the extent to which such reuse could: make possible particularly valuable habitat restoration;

manage
potential salinity impacts from the use of Bay dredged materials;
create
funding partnership opportunities with Bay dredgers; complement
(or compete
with) the restoration of Hamilton Field and other beneficial
reuse
opportunities in the Bay.

LEVEE PROTECTION PLAN

* The Long-Term Levee Protection Plan document Does Not
Adequately Explain
the Levee Program.

The Levee Program Appendix contains little information regarding
the actual
program which is proposed to be undertaken. The document does
not contain
adequate information regarding:

- which of the Delta's levees would be repaired, replaced or
moved;
- the environmental impacts of this program;
- the cost-effectiveness of this program;
- the trade-offs between restoration and levee maintenance;
- how this program would complement, or interfere with, the
ERPP; or
- the availability of needed borrow or dredged materials (see
above).

We recommend that the DEIS/R be revised to provide adequate
information
regarding these issues.

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